

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3

4 D. GEORGE SWEIGERT

5 Plaintiff,

6 vs.

7 JASON GOODMAN,

8 Defendant

Case No.: 1:18-cv-08653-VEC-SDA

9

10 **DEFENDANT GOODMAN'S
EMERGENCY MOTION FOR A SHOW
CAUSE HEARING AND TO COMPEL
PLAINTIFF TO UNDERGO
PSYCHOLOGICAL EVALUATION**

11 Defendant Jason Goodman pro se comes now to move the court to compel Plaintiff to
12 show cause as to why an order should not be entered holding him in criminal contempt or such
13 other relief which this honorable court may deem appropriate for repeatedly ignoring the orders
14 of this court, interfering with officers of the court and for ongoing deliberate offenses against
15 public justice. In addition to "spamming" the docket in this matter, Plaintiff has attempted to
16 intervene in four unrelated lawsuits against Defendant. Plaintiff has taken overt and illegal
17 action to deliberately interfere with officers of the court to influence the outcome of these cases.

18 After the filing of Defendant's Summary Judgement motion, Plaintiff undertook his most
19 egregious efforts to date, making false statements to law enforcement, publishing death threats
20 and engaging in cyberstalking and cyber harassment intended to defame and intimidate
21 Goodman and his lawyers and their families. Plaintiff's public statements against interest about
22 a family history of medically treated schizophrenia cause his escalating aggressive and unhinged
23 behavior to raise urgent questions about his mental health. Defendant and his colleagues fear for
24 their personal safety and respectfully request that the Court order a Mental Health Assessment of
25 Plaintiff and if found unfit to represent himself, to compel him to retain counsel before this

26 DEFENDANT'S APPLICATION FOR A SHOW CAUSE HEARING SEEKING TO COMPEL PLAINTIFF TO
27 UNDERGO PSYCHOLOGICAL EVALUATION - 1

1 matter proceeds. At the requested evidentiary hearing Goodman will present witnesses
 2 including his colleagues and lawyers Larry Klayman and John Snyder, as well as police and FBI
 3 Joint Task Terrorism Task Force members who are presently investigating Sweigert's illegal
 4 conduct. Defendant prays the court will find Plaintiff in criminal contempt for this pattern and
 5 practice of deliberate offenses against public justice and for the other reasons stated herein.
 6

7 **BACKGROUND**

8 This case was commenced by Pro Se Plaintiff D. George Sweigert on June 14, 2018. A
 9 date selected not for judicial expedience or to remedy an actual injury, but according to
 10 Plaintiff's own public statements to "commemorate the one-year anniversary" of an event he
 11 refers to as the "dirty bomb hoax". Defendant has alleged the incident was provoked by
 12 Plaintiff, his brother George Webb Sweigert ("Webb") or their associates to entrap Defendant.
 13

14 Since commencement of this action, Plaintiff has attempted to intervene in four separate
 15 unrelated lawsuits against Defendant. Defendant has alleged Plaintiff played an active role in
 16 provoking all four of the suits. Plaintiff has brazenly abused the federal courts and U.S. Postal
 17 service in this obsessive ongoing legal pursuit of Defendant. To further frustrate Defendant,
 18 Plaintiff has engaged in egregious extrajudicial activity intended to break Defendant's
 19 relationship with his attorneys, harm them in their trades and professions, and deny Defendant an
 20 opportunity to mount a legal defense. Plaintiff simultaneously makes unhinged efforts to
 21 provoke public hatred and violence against Defendant and his colleagues and lawyers and to
 22 concoct civil or criminal legal actions against them. Plaintiff shows no signs of mitigating this
 23 behavior, in fact he continues to increase his illegal efforts on a near daily basis.
 24

25
 26 On June 1, 2021, Defendant filed a motion for summary judgement See ECF No. 277-
 27 280. Since then, Plaintiff's abusive, harassing behavior has increased dramatically. Plaintiff has
 28 DEFENDANT'S APPLICATION FOR A SHOW CAUSE HEARING SEEKING TO COMPEL PLAINTIFF TO
 UNDERGO PSYCHOLOGICAL EVALUATION - 2

1 continued his attempts to intervene in suits against Defendant which he has no right or interest
2 in, solely to harass Goodman and increase proceedings in each case. In his most recent deceitful
3 effort, Plaintiff has made false statements to law enforcement and issued public death threats
4 along with other acts intended to incite violence and hatred against Defendant and break his
5 relationships with attorneys representing him in this instant action as well as unrelated matters.
6
7 Defendant has been represented by John Snyder (“Snyder”) in NATAS v MSD (20-cv-07269-
8 VEC-OTW). Separately, in the past, Defendant has been represented by attorney Larry Klayman
9 (“Klayman”) in unrelated matters and remains in regular communication with Klayman.
10

11 CYBER HARASSMENT AND INTERFERING WITH OFFICERS OF THE COURT

12 1. Plaintiff Filed a Frivolous Bar Complaint Against Snyder

13 After a public discovery hearing with Judge Caproni on April 30, 2021 Sweigert filed a
14 baseless, frivolous complaint with the New York State Bar Association in a deliberate
15 effort to harm Snyder in his trade and profession and in turn to damage the relationship
16 with Goodman (**EXHIBIT A**). In the complaint, Sweigert alleged without evidence that
17 some sort of barter agreement was in place between Snyder and Goodman and that it was
18 inappropriate or somehow represented a violation. The allegation is baseless and false,
19 no such arrangement exists. Snyder’s fees have been paid by check in U.S. Dollars. *See*
20 Affidavit of Jason Goodman (**EXHIBIT B**)

21 2. Plaintiff Publicized a Photo of Snyder’s Infant Daughter

22 The court has heard previously of the Plaintiff’s “news” postings about Defendant. On or
23 around July 22, 2021, Plaintiff published a web page that has since been involuntarily
24 removed <https://www.sdnny.info/post/u-s-marshals-service-advised-of-citizens-grand->
25 [jury-activities-to-protect-federal-judges](https://www.sdnny.info/post/jury-activities-to-protect-federal-judges) (**EXHIBIT C**). The page included a photo of
26 DEFENDANT’S APPLICATION FOR A SHOW CAUSE HEARING SEEKING TO COMPEL PLAINTIFF TO
27 UNDERGO PSYCHOLOGICAL EVALUATION - 3

1 Snyder with his three-year-old daughter and falsely accused Snyder of belonging to a
2 “domestic terrorist” club. There is nothing newsworthy about this photo of Snyder’s
3 infant daughter. Plaintiff publicized it expressly to harass, annoy, and intimidate Snyder
4 and dissuade him from representing Goodman. In a phone call of August 11, 2021,
5 Snyder resigned as Goodman’s attorney stating he is preparing a motion to withdraw and
6 citing fears for the safely of his infant three-year-old daughter and his family in general
7 along with his opinion that Sweigert is psychopathic.

8

9 **3. Plaintiff Published a Death Threat Against Goodman and Klayman**

10 On the same page, Sweigert featured a ghoulish representation of Goodman and Klayman
11 with their heads cut off and stitches sewn over eyes and mouth along with a tombstone
12 engraved with the word “BYE”. The disturbing depiction is a clear reference to the brutal
13 Jivaroan practice of murdering one’s enemies through ritualistic decapitation and head
14 shrinking. Shrunken heads were a symbol of power and kept as totems to ward off future
15 threats. A victim’s skull would be removed, and the eyes and mouth sewn shut to prevent
16 the soul of the vanquished from escaping. Jivaroan believed this to be the most brutal,
17 tortuous death possible. The display of these totems was intended to strike fear into the
18 hearts of those who might challenge their possessor. Sweigert’s depraved message,
19 which amounts to death threats and incitement of violence against Goodman and his
20 lawyers, including the three-year-old daughter of Mr. Snyder, is particularly disturbing
21 given Plaintiff’s public admission of a family history of schizophrenia and his
22 increasingly escalating extrajudicial harassment.

23

24 **4. Plaintiff Made False Statements to Philadelphia PD and the FBI**

1 Sweigert had previously harassed Klayman on July 4, 2021, making false statements via
2 email to the Philadelphia Police and FBI regarding a public event Klayman and Goodman
3 hosted in Philadelphia. Detective Wallace of the Philadelphia PD and Detective Hinnov,
4 FBI Joint Terrorism Task Force interviewed Klayman and Goodman and revealed
5 Sweigert's communication with them. They monitored the event and of course it was a
6 completely lawful, non-violent public event broadcast in its entirety on the internet
7 (<https://youtu.be/yskjsBXTzq0>). Goodman and Klayman remain in communication with
8 the Detectives and were told a criminal referral against Sweigert was being forwarded to
9 the U.S. Attorney for the Eastern District of Pennsylvania.

12 **5. Plaintiff is Interfering with Officers of the Court**

13 **a) Sweigert is Harassing Klayman**

14 Sweigert is attempting to intervene in pending legal actions involving Klayman which
15 Sweigert has no right or interest in. Sweigert has been emailing opposing counsel in
16 Klayman's active cases. Sweigert has filed numerous frivolous bar complaints and
17 sent defamatory emails specifically intended to harm Klayman. **(EXHIBIT D)**

19 Klayman has provided a sworn affidavit *See (EXHIBIT E)*

20 **b) Fraud on the Court in Sweigert v CNN**

21 Plaintiff Sweigert's brother Webb has filed a civil suit against Cable News Network
22 ("CNN") in the Eastern District of Michigan, also as a pro se plaintiff. Plaintiff
23 Sweigert has attempted to intervene in Sweigert v CNN, declaring it related litigation
24 to Sweigert v Goodman and moving to relocate the case to the Southern District of
25 New York. The Honorable Gershwin Drain has denied Sweigert's intervention by
26 right *See* 20-cv-12933-GAD-KGA ECF Nos. 9 & 10 **(EXHIBIT F)**. Defendant

1 Goodman filed an Amicus Curiae brief in Sweigert v CNN in which he alleges and
2 presents evidence that Sweigert and Webb perpetrated a fraud on the court,
3 conspiring with or otherwise forging information pertaining to Richard Loury
4 (“Loury”) an employee of the District Court in Eastern District of Michigan. *See* 20-
5 cv-12933-GAD-KGA ECF No. 12 (**EXHIBIT G**).
6

7 **c) Sweigert Used the U.S. Postal Service in Furtherance of Fraud**

8 Sweigert has changed his address in this matter four times. Defendant has alleged
9 Plaintiff is hiding his address to avoid accountability for his illegal acts. Magistrate
10 Judge Aaron addressed this issue in a hearing with the litigants and Sweigert stated
11 under penalty of perjury that his legal mailing address was General Delivery Nevada
12 City, CA 95959. The U.S. Postal Service does not corroborate this claim and in fact
13 refuses delivery to this address. The most recent docket entry as of this filing reflects
14 mail sent by the Court to Sweigert has once again been returned as undeliverable.
15

16 **CONCLUSION**

17 For the compelling reasons set forth herein, Defendant Goodman respectfully requests
18 that the Court find Plaintiff in criminal contempt of court and enter judgement against him as a
19 sanction for his relentless abusive behavior and order him to cease and desist from this
20 harassment. This lawsuit is being used illegally by Sweigert as a pretext to harm Goodman
21 generally and anyone who associates with him. Plaintiff Sweigert should be ordered to undergo a
22 psychological evaluation by a psychiatrist chosen by this honorable Court and paid for by the
23 Defendant. If the report confirms mental illness, Defendant respectfully moves the Court to order
24 Plaintiff to retain counsel, and declare him mentally unfit to continue pro se. Mr. Snyder and
25 Mr. Klayman are available to testify at an evidentiary hearing in support of this motion.
26 DEFENDANT’S APPLICATION FOR A SHOW CAUSE HEARING SEEKING TO COMPEL PLAINTIFF TO
27 UNDERGO PSYCHOLOGICAL EVALUATION - 6
28

This evidentiary hearing is necessary, with appropriate relief being granted, not only to prevent more harm being done by Plaintiff to Goodman, his colleagues and lawyers, and their families, through cyber bullying and harassment, but also because Plaintiff is attempting to incite violence against them with death threats and other illegal heinous actions.

In short, Plaintiff is using this honorable Court and this case as the springboard and pretext to wage a literal “campaign of terror” against anyone associated in any way with Defendant and to destroy his livelihood by harming his associations with others. This has already occurred with Mr. Snyder’s resignation over fears for his three-year-old daughter and family.

To protect the integrity of the judicial process, this honorable Court must act to preserve its own rightful authority to mete out justice in the courtroom. Plaintiff must not be allowed to supersede the Court's authority and use any means, without limitations, to irreparably harm Defendant. Plaintiff's illegal means know no bounds and he refuses to adhere to the orders of this court or any convention of human decency. In short, he has made a dangerous mockery of the entire judicial and legal system as a whole.

To avoid the continuing severe harm and damage as set forth herein, Plaintiff respectfully requests an evidentiary hearing on an emergency basis, with relief being granted as this honorable Court may deem appropriate under these dire circumstances.

Signed this 12th day of August 2021

Respectfully submitted,



Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org

DEFENDANT'S APPLICATION FOR A SHOW CAUSE HEARING SEEKING TO COMPEL PLAINTIFF TO
UNDERGO PSYCHOLOGICAL EVALUATION - 7

(EXHIBIT A)

FFrom: **Spoliation Notice** <spoliation-notice@mailbox.org>
Date: Sat, May 1, 2021 at 1:54 PM
Subject: Bar Complaint against S.D.N.Y. practicing attorney
To: AD1-AGC-newcomplaints@nycourts.gov <AD1-AGC-newcomplaints@nycourts.gov>
Cc: samuel.eichner@finnegan.com <samuel.eichner@finnegan.com>, margaret.esquenet@finnegan.com <margaret.esquenet@finnegan.com>, heavnerb@finnegan.com <heavnerb@finnegan.com>, john@jhsnyderlaw.com <john@jhsnyderlaw.com>, legal@support.youtube.com <legal@support.youtube.com>, copyright@youtube.com <copyright@youtube.com>, Spoliation Notice <spoliation-notice@mailbox.org>

To:

Abigail Reardon, Esq.
Robert J. Anello, Esq.
Attorney Grievance Committee of the
First Judicial Department (AGC)
180 MAIDEN LANE
17TH FLOOR
NEW YORK, NY 10038
(212) 401-0800

Subject: Attorney misconduct

Ladies and Gentlemen,

This preliminary professional conduct and ethics violation allegation concerns the following attorney:

John Hoover Snyder
John H. Snyder PLLC
555 Fifth Avenue, Suite 1700
New York, NY 10017
(212)-856-7280
(212)-304-9230 (fax)
john@jhsnyderlaw.com

The lion's share of observed alleged misconduct took place during a discovery conference at the S.D.N.Y. (April 30, 2021). The above referenced attorney apparently misrepresented several material facts to a federal judge, apparently misrepresented his ability to conduct searchable discovery, and apparently revealed a quasi-barter trade for services arrangement that presents a conflict of interest with his client, Jason Goodman in the following matter:

S.D.N.Y., 1:20-cv-07269-VEC The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.
Valerie E. Caproni, presiding

The undersigned is not a party in the above referenced lawsuit.

1. Misrepresentation of "disabled" YouTube social media account

Apparently, with full knowledge that the "facts" to be presented to Judge Valerie Caproni at this discovery conference the above referenced attorney allowed his client (with whom a dubious barter relationship may exist) to present a complete falsehood to her

honor, namely that the undersigned had "disabled" the client's social media account, which prevented the access to discoverable podcast videos on YouTube, LLC by the plaintiff's in the above referenced lawsuit.

2. Misrepresentation of the difficulty to obtain searchable evidence

During the discovery conference the above referenced material alluded to her honor that it would be nearly impossible to conduct a search of digital media in the form of 200-300 stored electronic files for key "trigger words".

This was an apparent intentional falsehood concerning the above referenced attorney's deep involvement in discovery searches utilizing artificial intelligence and machine learning. These statements to the judge are in direct contravention to public statements made by this attorney as to the ease to find such materials (see attached document).

Please note this social media podcast by this attorney:

<https://www.youtube.com/watch?v=yvOOcAJpMUQ>

and

<https://anchor.fm/startuphunter/episodes/Highwire-to-Harvard-Agnes-Intelligence-LegalMedia-Artificial-Intelligence--John-H--Snyder-e3fnf7>

3. Strange compensation arrangement

It was revealed during the discovery conference with Judge Caproni that there was an unorthodox relationship between this attorney and his client (Mr. Goodman). The remarks made before the judge indicated some type of "trade-out" or barter relationship between the client (Mr. Goodman) and his attorney.

See:

QUESTION

May a lawyer participate in a barter exchange?

https://nysba.org/NYSBA/Content%20Conversion/Round%201/Content%20Folder/EthicsOpinions/Opinions601675/Opinions601675A_ssets/EO_665.pdf

Note: Canon 5, EC 5-1, EC 5-21, DR 5-103(B)

Best,

D. Geo. Sweigert

----- Original Message -----

From: Spoliation Notice <spoliation-notice@mailbox.org>
To: Jason Goodman <truth@crowdsourcethetruth.org>, Spoliation Notice <spoliation-notice@mailbox.org>, "copyright@youtube.com" <copyright@youtube.com>, "legal@support.youtube.com" <legal@support.youtube.com>
Date: 05/01/2021 12:54 AM
Subject: FRCP Rule 45 subpoena to YouTube for JASON GOODMAN channel

Sir,

The undersigned assumes that you receive records of those accounts that have served a copyright strike or privacy strike on your YouTube, LLC video content (see JASON GOODMAN YouTube channel).

It would appear that only such strikes submitted within the last three (3) to four (4) months to the YouTube channel "JASON GOODMAN" would have any bearing on your insinuations made to Judge Caproni. You would have evidence of the origins of such strikes.

It is doubtful you will locate a strike to JASON GOODMAN from the undersigned that has taken place in the last twelve months, if any.

However, the undersigned can move forward with a Rule 45 subpoena to YouTube, LLC. As a courtesy to YouTube, LLC they are copied in this e-mail message with background court documents provided.

Best,

> On 05/01/2021 12:31 AM Jason Goodman <truth@crowdsourcethetruth.org> wrote:

>
>
> Do you deny submitting complaints to YouTube about channels controlled by me?
>
>> On Apr 30, 2021, at 6:21 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote:
>>
>> Sir,
>>
>> After hearing your appalling accusations to District Judge Valeria Caproni in today's NATAS v. MSDI discovery conference, the undersigned respectfully declines your invitation.
>>
>> Your failure to adequately and truthfully describe the situation concerning the production of video content and your YouTube channel status is very disconcerting.
>>
>> The undersigned trusts that you will be able to back-up the allegations that somehow the Plaintiff was involved in this so-called YouTube, LLC account (JASON GOODMAN) termination of April 12, 2021 and the consequential disabling of public video review (to apparently frustrate discovery in two federal lawsuits).
>>
>> The undersigned believes that you should be very hesitant about providing "good faith" assertions a day prior to your courtroom antics, which speak for themselves.
>>
>> Good Day,
>>
>>
>>



show_250- Goodman-
temp.pdf Snyder...py.pdf

(EXHIBIT B)

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 D. GEORGE SWEIGERT

Case No.: 1:18-cv-08653-VEC-SDA

5 Plaintiff,

6 vs.

AFFIDAVIT OF JASON GOODMAN

7 JASON GOODMAN,

8 Defendant

9

10 1. I, Jason Goodman am the pro se Defendant in Sweigert v Goodman and the owner of
11 Multimedia System Design, Inc (“MSD”) the target of NATAS v MSD.
12

13 2. I have alleged in both cases that the lawsuit against my corporation was deliberately
14 fomented by pro se Plaintiff D. George Sweigert merely to increase legal and financial
15 pressure on me and force me to default.
16

17 3. I allege this was done via an email sent by workingactress@gmail.com through a form
18 notification on the NATAS web site. The email from an unknown sender falsely alleged
19 a legitimate first amendment protected parody I created was a copyright infringement. If
20 this message was not sent by Sweigert himself, I allege it was sent by someone acting on
21 his behalf and included false claims with the specific intent of providing NATAS with a
22 pre-text to sue.
23

24 4. In a phone call with attorney Margaret Esquenet, prior to NATAS bringing suit, I
25 suggested that a lawsuit could and should be avoided. I offered to remove the offending
26 image immediately if NATAS would withdraw their YouTube complaint. I further
27 warned Esquenet that this email message from workingactress@gmail.com was very
28

1 likely sent by Sweigert and for the specific purpose of drawing her client into costly
2 litigation. I also assured Esquent that I would in fact remove all occurrences of the image
3 immediately. Inexplicably, Esquent refused, and the result was an extremely costly time-
4 consuming litigation that remains before the court.
5

6 5. Sweigert has aggressively agitated EMMYs v MSD by attempting to intervene, by
7 emailing opposing counsel repeatedly and by filing multiple frivolous bar complaints
8 against my attorney John Snyder.
9
10 6. The most egregious and inappropriate agitation of my attorney Sndyer occurred on or
11 around July 22, 2021, when Sweigert publicized a photo of Snyder's infant daughter on
12 the internet along with a depraved and deeply disturbing death threat.
13
14 7. Last night, on August 11, 2021, in a phone call, Snyder informed me he would withdraw
15 from NATAS v MSD leaving me without representation and he was doing this because
16 he was not prepared to have maniacs come after his daughter.
17
18

19 Sworn to under penalty of perjury that the foregoing is true and correct to the best of my personal
20 knowledge and belief.
21
22

23 Signed this 12th day of August 2021
24

25 Respectfully submitted,
26



27 Jason Goodman, Defendant, Pro Se
28 252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org

(EXHIBIT C)



SDNY.ORG

Jason Goodman George Webb Cyber
Stalking Alt-Right DEFANGO Robert
David Steele Larry Klayman

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#SDNYORG a day ago 2 min read



[ALERT:] U.S. Marshals Service advised of Citizens Grand Jury activities to protect federal judges

Updated: 5 hours ago



Above: The CrowdSource The Truth Citizens Grand Jury seems to be shrinking now that every move they make is reported to the U. S. Marshals Service (U.S.M.S.). part of the "domestic terrorism lite" club.

Let's Chat!

Federal judges breath easier now that the COUNTER LAWFARE FUND is reported to the U.S. Marshals Service for any noticeable activity.

NEWS ALERT: Larry Klayman has reported he will be in Tombstone, Arizona between July 26th and July 28th, 2021. All law enforcement advised.

Tombstone Marshal's Department
JIM ADAMS
315 E. Fremont Street
PO Box 339
Tombstone, AZ 85638
Phone: (520) 457-2244
Email: jadams@cochise.az.gov



Conspiracy crack-pots Larry "Skipper" or "Skip" Klayman and Jason "Little Buddy" Goodman will now have their daily activities reported to the U.S.M.S. in an effort to alert judicial staff to the emerging potential *domestic terrorist* *lite* threat.

Let's Chat!

U.S. Department of Justice
United States Marshals Service



WANTED BY U.S. MARSHALS



GOODMAN, Jason aka Little Buddy and KLAYMAN, Lawrence aka Skip

Let's Chat!



Techdirt Is Fighting A New Lawsuit



from the *slapp-suits* dept

Thu, Jul 22nd 2021 10:44am — [Mike Masnick](#)

Techdirt was recently sued in Florida by [Larry Klayman](#) for an article that we published concerning the US Court of Appeals for the District of Columbia Circuit suspending his license for 90 days. We strongly believe that this case is entirely without merit, and is a clear attempt to silence opinion and criticism via the court system.

Last week, we asked the court to dismiss the lawsuit under Florida's anti-SLAPP law, and we hope that the court will agree. Beyond that, while litigation is still ongoing, we'll have no further comment, other than to note our continued advocacy for the adoption of more state anti-SLAPP laws and a strong federal anti-SLAPP law.

<https://www.techdirt.com/articles/20210722/09501147223/techdirt-is-fighting-new-lawsuit.shtml>

adopted the magistrate's report and recommendation. Additionally, in their last motion they

randomly attacked us of course and the defense attorney, Stacey St. John, completely made the record. *See ECF Nos. [128-1]; [128-2]* (reply to response to reconsideration). To address the

attack on us, one defendant, during a voice recording, was forced to say "on more than one occasion the . . . act [sic] in a grossly inappropriate [sic] manner with the children. His conduct

may not have been sexual in the sense that he intended to or did derive any sexual pleasure from it or that he intended that the children would. That, however, does not mean that he didn't engage in those acts or that his behavior was proper." *Klayman v. City Pages*, 650 Fed. Appx. 744, 746

(11th Cir. 2016) (citing records from Klayman's 2009 divorce hearing regarding Klayman's behavior towards his own children). *See Exhibit -- 2*. Plaintiffs' failure to consider how placing

[O]n more than one occasion the Plaintiff act [sic] in a grossly inappropriate [sic] manner with the children. His conduct may not have been sexual in the sense that he intended to or did derive any sexual pleasure from it or that he intended that the children would. That, however, does not mean that he didn't engage in those acts or that his behavior was proper.

And for all his protestations of innocence ... he repeatedly invoked his Fifth Amendment right against self-incrimination ... [Because this is a civil proceeding,] the Court may draw an adverse inference from a party's decision not to respond to legitimate questions....

D.E. 95-2 at 22. Mr. Klayman filed an

Let's Chat!



OPINION AND EDITORIAL

All citizens should be on the look out for the "feed the tree of liberty with the blood of tyrants" crowd at the COUNTER LAWFARE FUND, operated by CrowdSource The Truth. Any noticeable activity should be reported to the U.S. Marshals Service as a courtesy.

Kindly document statements at the time-marks for these so-called "domestic threat" videos. Report the video with URL link and time-marks of commentary. Phrases like:

We need to take action now

We are going to indict so and so with a criminal indictment

We are re-writing the Constitution

We our racist bigots

We work for SPUTNIK and other Russian media groups

We use judicial intimidation to put federal judges on notice

We make videos of ourselves masturbating

We store 500 naked pictures of ourselves on our laptop

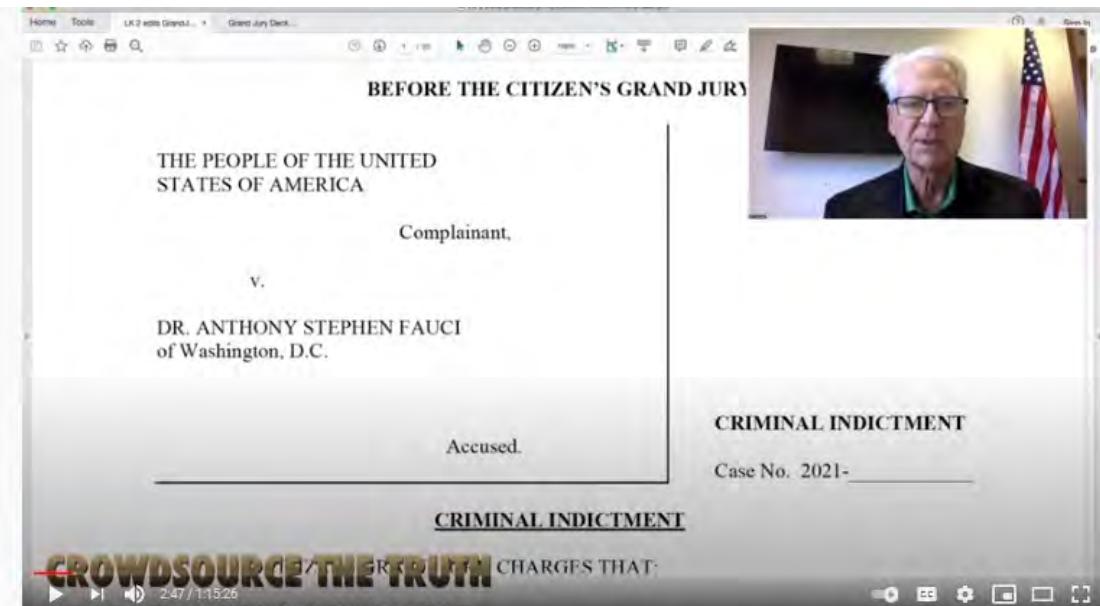
We covet TINDER messages from 18 year old girls

We are in debt and don't pay child support

We have inappropriate contact with our children

Let's Chat!

etc.



Let's Chat!

Every Breath You Take



**Copy of Jason Goodman's Police Report
Please download and send to all law enforcement agencies**



Jason-Goodman-Police-Report - Copy (1).pdf
Download PDF • 1.08MB



Photo of Mr. Snyder
& child redacted



Let's Chat!

Above: John H. Snyder, esq. of the COUNTER LAWFARE REPORT (replacing Brian Vukadinovich). The newest member of the so-called *domestic terrorist* *lite* club.



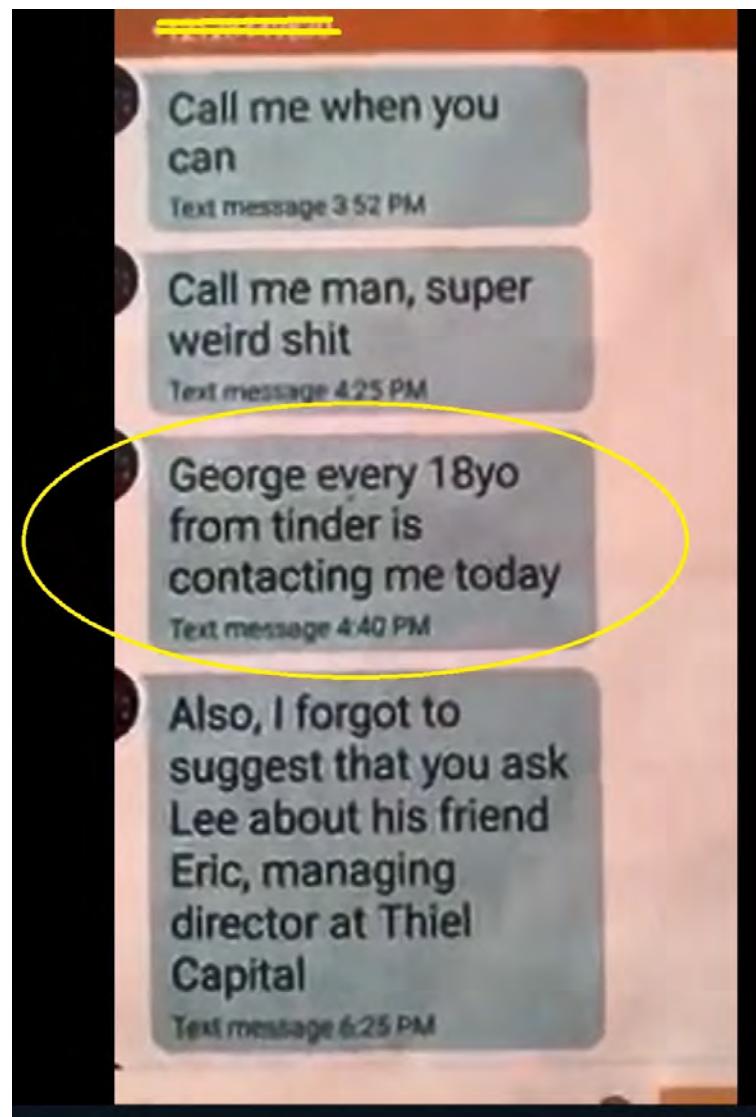
The Counterlawfare Report with Brian Vukadinovich – Cameras in Courtrooms Why The Public Is Kept Out
1,071 views

102 2 SHARE SAVE

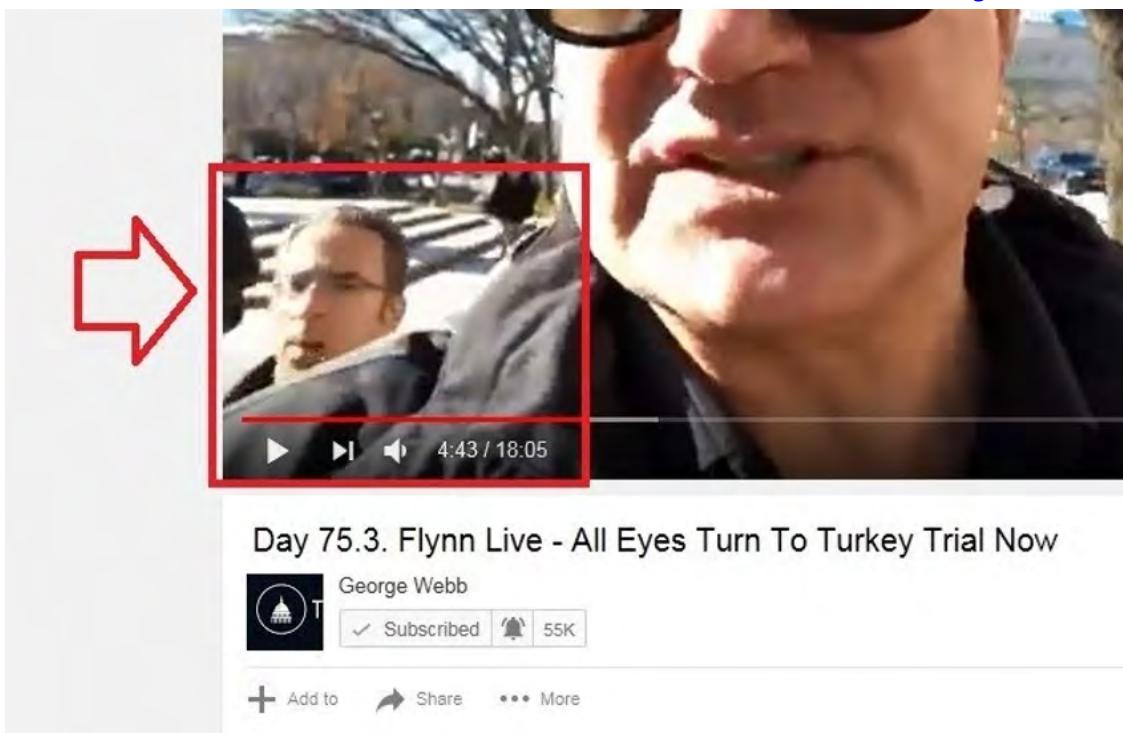
SUBSCRIBE 69K

CREEPY FACTS ABOUT JASON GOODMAN

Let's Chat!



Let's Chat!



Above: Jason Goodman physically stalking George Webb (apparently punched in the kidney region)



"I support Jason Goodman", "Dr." Jerome Corsi, PhD

Let's Chat!



NEW TROUBLES IN MICHIGAN FEDERAL COURT

Instead of holding an evidentiary hearing on this most serious matter, Judge Lillard addressed it verbally, stating she had called now-U.S. District Court Judge Gershwin Drain regarding the order and he denied authoring it on his docket. The phone parte action in violation dure. **Jason Goodman Key witness** previously worked in the cutor's Office with Judge lley Drain, constituting a conflict of interest. Lillard has said in a published article that she considers Wayne Co. Prosecutor Kym Worthy her "mentor." Chief Judge Timothy Kenny recused Lillard from

Above: SPUTNIK radio affiliate Jason "Pinko" Goodman may be in hot water for throwing allegations towards the Clerk of the Court in the Eastern District of Michigan.

Jason Goodman is seeking to have a "public corruption" case investigated. Goodman says that NATO hater George Webb schemed with the Clerk of the Court. Some observers remark that it appeared as a "kiss of death" document, apparently meaning talk of possible political trauma, aka industrial accident.



U.S. District Court Judge Gershwin Drain

Let's Chat!



Above: Russian SPUTNIK affiliate Jason Goodman outside the federal courthouse.

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The broadcaster gains no profit from broadcasted content, so it falls under "Fair Use" guidelines: www.copyright.gov/fls/fl102.html

Let's Chat!



37 views 0 comments

1 

Let's Chat!

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Let's Chat!

(EXHIBIT D)

----- Forwarded message -----

From: **Larry Klayman** <klaymanlaw@gmail.com>
Date: Sun, Aug 8, 2021 at 7:01 AM

Mr. Sweigert:

I have never had any association with you - neither as a client or in any other way. In fact, I did not even know who you were but for the fact that you have been waging a campaign to harm Jason Goodman, the CEO of Crowdsource the Truth and instituted litigation against him, which gave rise apparently to a countersuit.

I also have learned that you have been filing bar complaints against his attorney John Snyder in another case which concerns Mr. Goodman and his company and even threatened Mr. Snyder's children, posting a picture of his daughter Agnus, who is three years old, on the internet.

In this regard, you have also leveled death threats against me and Mr. Goodman, and have incited violence against not just me, but also my colleagues as well as my friends and family.

You also made demonstrably false statements to the Philadelphia Police and FBI with regard to me, Mr. Goodman, our colleagues and others in the days before and during Freedom Watch's Third Continental Congress, all intended to harm us and derail our conference. Again, this is obviously related to your trying to influence the litigation with Mr. Goodman.

In this regard, you also have defamed me through the internet publishing that I am a child molester of my own children, a racist and a domestic terrorist, among other false and misleading statements.

Couple this with using the internet to contact lawyers and parties in litigation for my clients and me, for which you have absolutely no involvement, using as a pretext the false claim that you have a right to intervene, and defaming me with them as well. This, among other illegalities, constitutes tortious interference with my clients and me.

Not coincidentally, your social media internet platform was removed from the internet over your illegal conduct, but I understand you now have a new one to carry out your illegal and malicious actions all tied to your hatred of Jason Goodman and any lawyer who represents him or in my case who associates with him and his company Crowdsource The Truth.

Again, I demand that you not just cease and desist from your cyber bullying and harassment as well as related illegal acts. And, please seek psychiatric care and consultation immediately before you harm someone irreparably, as well as for your own benefit. I have learned that you have made a public admission that schizophrenia runs in your family. In your particular case, it appears that much more is at issue.

Govern yourself accordingly,

Larry Klayman

(EXHIBIT E)

IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff

Case No.: 1:18-cv-08653-VEC-SDA

vs.

JASON GOODMAN,

Defendant

AFFIDAVIT OF LARRY KLAYMAN

1. My name is Larry Klayman I am an attorney, legal advocate and television and radio personality and host. I have represented Jason Goodman as his attorney in the past and I participate in regular broadcasts on his Crowdsource the Truth talk show. Attached is a brief biography of my background. I have recently become aware of an individual named David George Sweigert.
2. On July 5 -6, My public interest group, Freedom Watch, Inc. produced an event in Philadelphia named the Third Continental Congress which was broadcast in part on the Sinclair networks, One America News, YouTube and in toto by Goodman.
3. This was an event that brought together prominent leaders from the political, legal, medical and technology world for a symposium in Philadelphia, PA. This event was meticulously planned and produced at great expense. It was widely publicized for many weeks on Mr. Goodman's broadcasts as well as Freedom Watch's own website. Prior to

the event, Mr. Sweigert maliciously contacted Philadelphia Police Department (PD) and the FBI making the false representations that the event was a subversive, white supremacist armed event catering to racists and fomenting violence.

4. As a result, Mr. Goodman and I were then interviewed by Philadelphia Police Department (PD) and the FBI prior to the event as a result of Sweigert's false statements. Goodman remains in contact with Philadelphia PD and the local FBI agent with regard to that matter and it has been referred to the U.S. Attorney for the Eastern District of Pennsylvania. Sweigert's false statements to the government constitute crimes under 18 U.S.C. 1001 and state statutes.
5. The entire event was monitored by law enforcement, who even were invited to attend and who did attend, and of course nothing illegal or violent was involved. Ironically, I represent several former police officers in Philadelphia, and my brother was a Philadelphia police officer and is now a practicing attorney.
6. Sweigert then continued his dangerous harassment, cyber bullying and cyber-squatting and incitement to violence by posting falsities and material incitements of violence against Goodman on his web page. Sweigert furthers his harassment and incitement to violence by disguising them as deranged and fake "news" articles. These cyber postings are also clearly defamatory per se, as they are intended to injure Goodman and his colleagues, including but not limited to me, in their trades and professions, as well as to falsely impute moral turpitude. As just one example among many, Sweigert depicted Mr. Goodman and me as shrunken head decapitated characters, reminiscent of ISIS beheadings of Jewish journalists in Syria and Iraq. Both Mr. Goodman and I are Jewish. To make matters even much worse, Sweigert depicted effigies of me and Mr. Goodman

along with a tombstone engraved with the word “Bye”—which sends messages to kill both Goodman and me. Apparently, Sweigert’s web hosting service provider found his egregious and sick death threats beyond the pale and terminated his account with them. This is only one of many such sick and deranged internet postings by Sweigert.

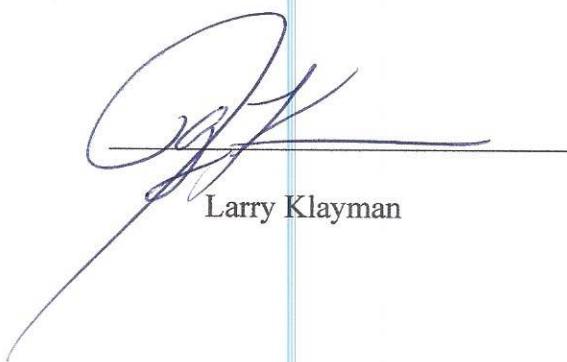
7. Sweigert’s relentless pursuit to destroy Goodman and now me as well by any means available to him continues to defy any sense of human decency if not sanity. It is hard to understand how Sweigert has time for any activity other than pursuing Goodman with frivolous lawsuits and sick maniacal malicious extrajudicial punitive efforts, juvenile in nature but highly deranged, dangerous, and damaging. These actions alone cause Mr. Goodman and I to believe, as any reasonable observer would, that Sweigert is mentally ill. When viewed in conjunction with the admissions I have learned that Sweigert has made against his own interests affirming a family history of clinically diagnosed schizophrenia cause Goodman and I to fear for our safety. Sweigert is clearly engaged in a campaign not only to harass, cyber bully, but also incite violence against Mr. Goodman and his colleagues including me and my family. Recently, I have been advised that another of Goodman’s lawyers, John Snyder, quit over Sweigert threatening with internet postings to harm his 3-year-old daughter.
8. It is finally time for Sweigert to be held to account before this honorable Court, since it is apparent based on what I have learned that he has made and continues to make a mockery of its processes and just authority while he wastes its limited resources, all paid for by the American taxpayer. To be clear the death threats and other sick acts of incitement to violence, are directly an outgrowth of this unfortunate litigation, and thus this honorable Court has the responsibility, power and authority to swiftly act to have this

end, before severe bodily injury or death occurs to Goodman and those with whom he associates. In today's world, this is no longer speculation with persons such as Sweigert, but a sad reality.

9. I would like to appear before your honorable court and offer further testimony as I understand that Mr. Goodman has requested an evidentiary hearing.

Sworn to under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief

Date: 8/12/21



A handwritten signature in black ink, appearing to read "LARRY KLAYMAN". The signature is fluid and cursive, with a long, sweeping line extending from the left side.

Larry Klayman

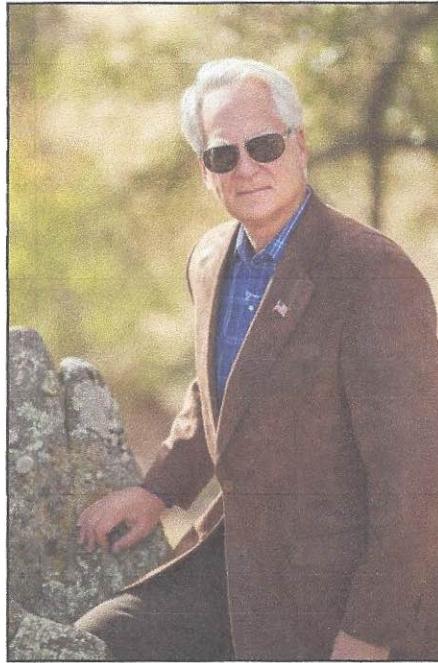
ABOUT LARRY KLAYMAN

Larry Klayman, founder of Judicial Watch and Freedom Watch, is known for his strong public interest advocacy in furtherance of ethics in government and individual freedoms and liberties. During his tenure at Judicial Watch, he obtained a court ruling that Bill Clinton committed a crime, the first lawyer ever to have done so against an American president. Larry became so famous for fighting corruption in the government and the legal profession that the NBC hit drama series "West Wing" created a character after him: [Harry Klaypool of Freedom Watch](#). His character was played by actor John Diehl.

In 2004, Larry ran for the U.S. Senate as a Republican in Florida's primary. After the race ended, he founded Freedom Watch.

Larry graduated from Duke University with honors in political science and French literature. Later, he received a law degree from Emory University. During the administration of President Ronald Reagan, Larry was a Justice Department prosecutor and was on the trial team that succeeded in breaking up the telephone monopoly of AT&T, thereby creating competition in the telecommunications industry.

Between Duke and Emory, Larry worked for U.S. Senator Richard Schweiker (R-Pa.) during the Watergate era. He has also studied abroad and was a stagiaire for the Commission



of the European Union in its Competition Directorate in Brussels, Belgium. During law school, Larry also worked for the U.S. International Trade Commission in Washington, D.C.

Larry speaks four languages—English, French, Italian, and Spanish—and is an international lawyer, among his many areas of legal expertise and practice.

The author of two books, *Fatal Neglect* and *Whores: Why and How I Came to Fight the Establishment*, Larry has a third book in the works dealing with the breakdown of our political and legal systems. His current book, *Whores*, is on now sale at WND.com, Amazon.com, BarnesandNoble.com, Borders.com, and all major stores and booksellers.

Larry is a frequent commentator on television and radio, as well as a weekly columnist, on Friday, for WND.com. He also writes a regular blog for Newsmax called "Klayman's Court."

Larry has been credited as being the inspiration for the Tea Party movement. (See "[Larry Klayman - The One Man TEA Party](#)," by Dr. Richard Swier, <http://fwusa.org/KFA>)



Support the work of
Freedom Watch at
[www.FreedomWatchUSA.org](http://FreedomWatchUSA.org)

(EXHIBIT F)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GEORGE WEBB SWEIGERT,

Plaintiff,

Case No. 20-cv-12933

v.

U.S. DISTRICT COURT JUDGE
GERSHWIN A. DRAIN

CABLE NEWS NETWORK, INC.,

Defendant.

**ORDER DENYING WITHOUT PREJUDICE MOTION FOR CHANGE OF
VENUE [#3]**

On October 31, 2020, Plaintiff George Webb Sweigert filed the instant action in this Court, alleging that Defendant Cable News Network, Inc. (“CNN”) knowingly published false and defamatory statements via the social media network Twitter. *See* ECF No. 1, PageID.15. Presently before the Court is a Motion for Change of Venue by D. George Sweigert. ECF No. 3. This individual, a “pro se non-attorney intervenor-applicant and party in interest,” asks this Court to transfer the venue of this case to the Southern District of New York. *Id.* On March 11, 2021, Plaintiff filed a late Response and asks this Court to deny the Motion and maintain this action in the Eastern District of Michigan. ECF No. 6.

Upon review of the Motion, it is clear that D. George Sweigert does not have standing to seek a change of venue at this juncture. This Motion is not properly

before the Court until and unless this Court grants D. George Sweigert permission to intervene under Federal Rule of Civil Procedure 24. Fed. R. Civ. P. 24. A motion to intervene must accordingly be filed and decided upon by this Court before D. George Sweigert may request a change in venue to another state. Thus, the instant Motion for Change of Venue [#3] is **DENIED WITHOUT PREJUDICE**.

IT IS SO ORDERED.

s/Gershwin A. Drain
GERSHWIN A. DRAIN
UNITED STATES DISTRICT JUDGE

Dated: June 4, 2021

CERTIFICATE OF SERVICE

Copies of this Order were served upon attorneys of record on
June 4, 2021, by electronic and/or ordinary mail.

/s/ Teresa McGovern
Case Manager

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GEORGE WEBB SWEIGERT,

Plaintiff,

Case No. 20-cv-12933

v.

U.S. DISTRICT COURT JUDGE
GERSHWIN A. DRAIN

CABLE NEWS NETWORK, INC.,

Defendant.

**ORDER TO SHOW CAUSE WHY CASE SHOULD NOT BE DISMISSED
WITHOUT PREJUDICE**

On October 31, 2020, Plaintiff George Webb Sweigert filed the instant action against Defendant Cable News Network, Inc. (“CNN”). *See* ECF No. 1. A third party, D. George Sweigert, filed a Motion for Change of Venue, which this Court denied without prejudice.

The Court notes that service of the Summons and Complaint was not made upon Defendant CNN within 120 days after the filing of the Complaint. *See* Fed. R. Civ. P. 4(m) (“[I]f a defendant is not served within 120 days after the complaint is filed, the court . . . after notice to the plaintiff—must dismiss the action without prejudice against that defendant or order that service be made within a specified time.”).

Accordingly, **IT IS HEREBY ORDERED** that Plaintiff shall show cause, in writing, by June 18, 2021, why this matter should not be dismissed without prejudice. Failure to respond may result in dismissal of this case.

IT IS SO ORDERED.

s/Gershwin A. Drain
GERSHWIN A. DRAIN
UNITED STATES DISTRICT JUDGE

Dated: June 4, 2021

CERTIFICATE OF SERVICE

Copies of this Order were served upon attorneys of record on June 4, 2021, by electronic and/or ordinary mail.

/s/ Teresa McGovern
Case Manager

(EXHIBIT G)

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

George Webb Sweigert,

Plaintiffs,

v.

Cable News Network, Inc.,

Defendants.

Case No. :20-cv-12933-GAD-KGA

Honorable Gershwin A. Drain

**BRIEF OF AMICUS CURIAE JASON GOODMAN IN SUPPORT
OF DEFENDANT'S MOTION TO DISMISS**

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PRELIMINARY STATEMENT

Jason Goodman is a pro se non-attorney, non-party to this case. Goodman comes now as a friend of the court to share facts and evidence Goodman alleges reveal a fraud on the court intended to affect the outcome of this case.

STATEMENT OF FACTS

Non-party D. George Sweigert (“Sweigert”) is the brother of Plaintiff George Webb Sweigert (“Webb”). On November 6, 2020, non-party Sweigert filed a motion requesting the court change the venue of this legal action to the Southern District of New York. *See* ECF No. 3 (MOTION FOR CHANGE OF VENUE BY INTERVENOR-APPLICANT PARTY OF INTEREST). Sweigert’s pleadings indicate his belief that Sweigert v CNN is related litigation to Sweigert v Goodman, and in his view, in the interest of judicial efficiency should be transferred to the Southern District of New York. The transfer was denied via ECF No. 9.

Non-party movant Sweigert is the Plaintiff in Sweigert v. Goodman (Case 1:18-cv-08653-VEC-SDA) in which he is suing Amicus Goodman currently pending in the SDNY.

Goodman first became acquainted with Webb and Sweigert in 2017. Since his introduction to Webb and Sweigert, Goodman has been the Defendant in four separate civil lawsuits. Sweigert has attempted to intervene in three of the four suits and was denied.

On information and belief, Goodman alleges that Sweigert and Webb, in an effort to improperly involve Goodman in Sweigert v CNN, have conspired with or otherwise deceived a third individual, an employee of the court, Richard Loury (“Loury”), to commit a fraud on the court. Document properties of ECF No. 12 reveal that Loury is named as the author of pro se Plaintiff Webb’s pleading. (**EXHIBIT A**). These properties are visible in the free reader Adobe Acrobat DC or the commercial application Adobe Acrobat Professional.

On June 30, 2021, Goodman telephoned Loury at the court and asked how his name came to be associated with ECF No. 12 as the “author”. Loury stated “documents are sent to me. In order for us to upload something, I have to save it onto my computer. The document is uploaded

onto the website". When questioned further, he simply repeated himself. Mr. Loury implied but did not directly state that his name would be associated with the document merely as a function of him temporarily saving it on his computer prior to filing it electronically on the docket. This is incorrect and does not explain how Loury's name would be recorded within the PDF document's embedded metadata as the "author" of the document. The "author" must be someone with the name "Richard Loury" officially stored on their computer as the active user unless someone otherwise altered the document to contain Loury's name.

Non-party movant Sweigert is the author of the Ethical Hacker's Field Operations Guide (<https://drive.google.com/file/d/1BeVtzd7TKGpMvNonaUdD-Ls2RlGJm7JM/view>). The guide details tactics and methods for manipulating computer systems, transmitting clandestine communications and evading detection, among other things. In several pleadings in Sweigert v Goodman, Sweigert has made note of various aspects of PDF document metadata indicating his knowledge in this area.

CONCLUSION

For the reasons stated in Defendant's motion to dismiss and further for the foregoing reasons, Defendant's motion to dismiss should be granted. Additionally, Amicus Curiae Goodman prays the court will further investigate this matter relating to ECF No. 12 and alleged fraud on the part of Sweigert and Webb and take such action as it deems necessary.

By: 
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EXHIBIT A

Case 2:20-cv-12933-GAD-KGA ECF No. 12, PageID.62 Filed 06/18/21 Page 1 of 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION
AT DETROIT**

George Webb Sweigert, : CASE
Plaintiff, : NO - 2:20-cv-12933-GAD-KGA
V. : US DISTRICT COURT JUDGE
CABLE NEWS NETWORK, INC : Judge Gershwin A. Drain
: RESPONSE TO ORDER
: TO SHOW CAUSE

PLAINTIFF'S RESPONSE

Plaintiff hereby files this Response and, for the reasons stated here

The Plaintiff, George Webb Sweigert, filed a complaint in this lawsuit in District of Columbia in which Plaintiff asserted that the transactions were conducted in a manner that violated Plaintiff's rights and added to some of the administrative and legal expenses of Plaintiff in this case before the Court.

The Defendant, Cable News Network, Inc., filed a motion to dismiss Plaintiff's complaint in this case. Plaintiff is confused in person efforts to serve Plaintiff's complaint in this case.

The Plaintiff requests for the Court to issue an order to serve Plaintiff's complaint in this case on the Defendant. Two ways to serve Plaintiff's complaint in this case are by certified mail and by service of process by the United States Marshals Service.

